

Exhibit 2



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VIA EMAIL ONLY TO VALPEC@KIRTLANDPACKARD.COM

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**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation.*,
U.S. District Court for the District of New Jersey,
Case No. 1:19-md-02875-RBK-JS**

Dear Counsel:

Enclosed please find Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc.'s ("Teva" or "the Teva Defendants") affirmative deposition designations for the following Teva witnesses for use in the March 2024 TPP trial:

- Stefan Karlsson
- Pan Lin day 1
- Pan Lin day 2
- Jens Nassall
- Raphael Nudelman
- Narendra Vadsola

The Teva Defendants' designations are set forth in the accompanying excel spreadsheets. These designations may be used by Teva at the trial of this matter and, if used, will be shown by videotape or read into the record.

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Each of the designated witnesses are located outside of the United States, and based on current information known to undersigned counsel may be unavailable to testify in person at the time of trial. Teva reserves the right to serve additional affirmative designations for other Teva witnesses not disclosed here to the extent any of those witnesses become unavailable at the time of trial for any reason. Teva further reserves the right to present any or all of these witnesses in person should circumstances permit.

The Teva Defendants reserve the right to supplement, amend, edit, modify, or withdraw these designations at any time before or during trial. Teva further reserves the right to amend its designations in the event further issues arise prior to trial or if additional evidence or testimony is adduced during trial or pre-trial proceedings, and specifically may serve further affirmative designations for these and other witnesses in response to subsequent meet and confers, additional designations served by Plaintiffs or codefendants, the Court's rulings on motions for summary judgment and motions in limine, stipulations reached by the parties, witness availability issues or other reasons. In designating portions of the depositions above, Teva does not waive, and expressly reserves, any and all objections to the admissibility of the designated testimony at the trial of this matter.

Once you have had the opportunity to review, please let us know when you would like to meet and confer over the designations.

Respectfully,

/s/ Victoria Davis Lockard
Victoria Davis Lockard, Esq.
*Attorney for Teva Pharmaceuticals USA,
Inc., Teva Pharmaceutical Industries Ltd.,
Actavis LLC, and Actavis Pharma, Inc.*

cc: Lori G. Cohen, Esq. (*via email*)
Jessica Davidson, Esq. (*via email*)
Alexia Brancato, Esq. (*via email*)

Enclosures